

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**CROSS NOTICE OF DEPOSITION OF GENE KAMMERER**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that the deposition of GENE KAMMERER, will be taken jointly in connection with *In Re Pelvic Mesh/Gynecare Litigation*, Superior Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10, upon oral examination on October 17, 2012, at Riker, Danzig, Scherer, Hyland and Perretti, Headquarters Plaza, One Speedwell Avenue, Morristown, New Jersey, 07962-1981, at a time to be later determined.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, and Rule 4:14 of the New Jersey Rules of Court, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re Pelvic Mesh/Gynecare Litigation*, Superior

Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10  
and in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer oaths.

Dated: October 2, 2012.

Respectfully submitted,

/s/Christy D. Jones

Christy D. Jones  
Butler, Snow, O'Mara, Stevens &  
Cannada, PLLC  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4523  
[Christy.jones@butlersnow.com](mailto:Christy.jones@butlersnow.com)

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
(304) 414-1807  
[dthomas@tcspllc.com](mailto:dthomas@tcspllc.com)

COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND  
JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on October 2, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

*/Christy D. Jones*  
Christy D. Jones

ButlerSnow 14118545v1